

**Hearing Date and Time: February 04, 2015 at 9.45 a.m. (Eastern Time)**  
**Objection Deadline: January 28, 2015 at 4.00 p.m. (Eastern Time)**

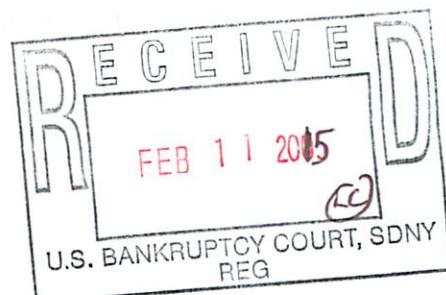
Atul C. Shah, MD  
2884 Manorwood Drive  
Troy, Michigan 48085  
Telephone (248) 879-0795 Home  
Telephone (248) 835-5025 Cell Phone

Representing Himself (Atul C. Shah) for  
MLC GUC Claim No. 28820 filed by Atul Shah

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

		-x
	1	
	1	
In re	1	
	1	
Motors Liquidation Company, et al.,	1	Chapter 11 Case No
f/k/a General Motors Corp., et al.	1	09-50026 (REG)
	1	(Jointly Administered)
	1	
Debtors.	1	
	1	
		-x

**RESPONSE BY ATUL C. SHAH TO THE RECENT ORDER OF  
HONORABLE JUDGE ROBERT E. GERBER AT THE  
UNITED STATES BANKRUPTCY COURT DATED  
JANUARY 30, 2015 DOCKET NUMBER 13070**



- Boston Mayor Martin Walsh said there was no doubt the city would be slammed, so a major effort now is making sure people are safe. That includes checking on elderly residents and working to get homeless people off the streets and into shelters, he said.
- "You can't fight Mother Nature, and whatever happens throughout the course of the storm, we just have to do our best to be prepared going into it, which I think we are," Walsh said.
- "I want everyone to understand that we are facing -- most likely -- one of the largest snowstorms in the history of this city," de Blasio said.

**Proofs of Delivery and Reason for the Delay to Receive the Response Letter by the Bankruptcy Court and Law Firms**

The primary reason for the Delay was secondary to the Super-Storm Juno that caused the DELAY or LATE SUBMISSION of my Response Letter to 10 Law Firms located in New York City.

I am enclosing the copies of the Proof of Delivery for Response Letter forwarded to 16 Law Firms via Unites Parcel Service (UPS) 2<sup>nd</sup> Day Air A.M. ® on January 26, 2015 (Exhibit C).

A. Following Ten Law Firms in New York City received the Response Letter on 1/30/2015 late secondary due to the Super-storm Juno.

1. Weil, Gotshal & Manges LLP, attorneys

**Motors Liquidation Company GUC Trust,  
767 Fifth Avenue, New York, New York 10153**

2. **Gibson, Dunn & Crutcher LLP, attorneys**  
**Wilmington Trust Company as GUC Trust Administrator**  
**200 Park Avenue, 47th Floor,**  
**New York, New York 10166 (Attn: Keith Martorana, Esq.)**

3. **FTI Consulting, as the GUC Trust Monitor**  
**3 Times Square, 11th Floor New York, NY 10036 (Attn:**  
**Conor Tully)**

4. **Crowell & Moring LLP, attorneys**  
**590 Madison Avenue, 19<sup>th</sup> Floor**  
**New York, New York 10022-2524**  
**(Attn: Michael V. Blumenthal, Esq.)**

5. **Cadwalader, Wickersham & Taft LLP, attorneys**  
**United States Department of the Treasury**  
**One World Financial Center,**  
**New York, New York 10281 (Attn: John J. Rapisardi, Esq.)**

6. **Vedder Price, P.C., attorneys for Export Development**  
**Canada**  
**1633 Broadway, 47th Floor,**  
**New York, New York 10019 (Attn: Michael J. Edelman,**  
**Esq. and Michael L. Schein, Esq.)**

7. **Kramer Levin Naftalis & Frankel LLP, attorneys for the**  
**statutory committee of unsecured creditors,**

1177 Avenue of the Americas,  
New York, New York 10036  
(Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq.,  
Lauren Macksoud, Esq., and Jennifer Sharret, Esq.)

8. The Office of the United States Trustee for the  
Southern District of New York,  
33 Whitehall Street, 21st Floor,  
New York, New York 10004

(Attn: Tracy Hope Davis, Esq.)

9. The U.S. Attorney's Office, S.D.N.Y.,  
86 Chambers Street, Third Floor,  
New York, New York 10007

(Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.)

10. Caplin & Drysdale, Chartered, attorneys  
375 Park Avenue, 35th Floor,  
New York, New York 10152-3500  
(Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.)

**B. Following One Law Firm in Detroit & Birmingham in Michigan;**  
received the Response Letter on 1/27/2015 in ONE DAY prior to  
Deadline of January 28, 2015 delivered by UPS. There were no  
Blizzard and Super-storms in Detroit City.

1. General Motors LLC,  
400 Renaissance Centers,  
Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo,  
Esq.)

C. Following One Law Firm in Birmingham in Michigan will returning the Response Letter back to me delivered by UPS. There were no Blizzard and Super-storms in Detroit City. Please note that this company is Motor Liquidation Company just few miles away from my home address in Michigan.

1. The Debtors, c/o Motors Liquidation Company,  
401 South Old Woodward Avenue, Suite 370,  
Birmingham, Michigan 48009  
(Attn: Thomas Morrow)

D. Following Two Law Firms in Dallas and Austin in Texas received the Response Letter on 1/28/2015 in TIME delivered by UPS. There were no Blizzard and Super-storms in Texas.

1. Stutzman, Bromberg, Esserman & Plifka, attorneys  
2323 Bryan Street, Suite 2200,  
Dallas, Texas 75201  
(Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.)
2. Kirk 09-50026-reg Doc 13045  
P. Watson, Esq.  
2301 Woodlawn Boulevard,  
Austin, Texas 78703

E. Following Two Law Firms in Washington DC received the Response Letter on 1/28/2015 in TIME delivered by UPS. There were no effect of Blizzard and Super-storms in Washington DC.

1. The United States Department of the Treasury

Pennsylvania Avenue NW, Room 2312,  
Washington, D.C. 20220  
(Attn: Joseph Samarias, Esq.)

2. Jeffrey Rhodes Esq.,  
Dickstein Shapiro, LLP,  
Attorneys for the GUC Trust,  
1825 Eye Street, NW  
Washington, DC 20006

**Nutshell summary:**

- Ten Law Firms located in New York City received my Response Letter two days late on January 30, 2015 secondary to Severe Weather Condition from the Blizzard of Century: the Super-storm Juno in New York City and North-east region of the United States of America.
- Remaining Five Law Firms were able to receive my Response Letter in TIME PRIOR TO DEADLINE OF JANUARY 28, 2015.
- One Law Firm located in Detroit Downtown received ONE DAY EARLIER on January 27, 2015 prior to deadline of January 28, 2015.
- One Law Firm located in Birmingham in Michigan is simply retuning my Response Letter for the unknown reason.
- Also, the closure report mentions that the United States Bankruptcy Court was CLOSED on January 27, 2015 and adjourned on Jan 27 and Jan 28 due to the SEVERE WEATHER CONDITION (Exhibit D).

- I may humbly request Honorable Bankruptcy Judge Robert E. Gerber and Wilmington Trust Company NOT TO START distributing the MONETARY WEALTH as my case is still pending with the Supreme Court of the United States.
- Sharing is caring. Let all of us share the God-gifted SIX OPULENCE including Monetary Wealth scientifically and appropriately as described in my Response Letter dated January 26, 2015 (January 26, 20015 is incorrect date and typographical error) that was filed on January 30, 2015 with docket number 13070 with the court.

### Conclusion

I, therefore, humbly request to the Honorable Judge Robert E. Gerber at the United States Bankruptcy Court to consider the Delay in receiving my Response Letter dated January 26, 2015 was due to the severe and historic Blizzard: the Super-storm Juno and nothing else.

Respectfully submitted,



Atul C. Shah, MD

2884 Manorwood Drive  
Troy, Michigan  
Plaintiff and Pro Se Litigant

February 8, 2015

**Copy forwarded to the following recipients:**

**1. Honorable Judge Robert E. Gerber**

United States Bankruptcy Court

Southern District of New York, Pro Se Clerk Office

One Bowling Green

New York, NY 10004-1408

**2. Weil, Gotshal & Manges LLP, attorneys for the Motors Liquidation Company GUC Trust,**

767 Fifth Avenue, New York, New York 10153

(Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.);

**3. Gibson, Dunn & Crutcher LLP, attorneys for Wilmington Trust Company as GUC Trust Administrator and for Wilmington Trust Company as Avoidance Action Trust Administrator, 200 Park Avenue, 47th Floor, New York, New York 10166 (Attn: Keith Martorana, Esq.);**

**4. The Debtors, c/o Motors Liquidation Company,**

401 South Old Woodward Avenue, Suite 370, Birmingham, Michigan 48009  
(Attn: Thomas Morrow);

**5. General Motors LLC, 400 Renaissance Center, Detroit, Michigan 48265**

(Attn: Lawrence S. Buonomo, Esq.);

**6. Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury,**

One World Financial Center, New York, New York 10281

(Attn: John J. Rapisardi, Esq.);

**7. The United States Department of the Treasury, 1500 09-50026-reg Doc 13045 Filed 01/14/15 Entered 01/14/15 16:26:57 Main Document**

Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.);

**8. Vedder Price, P.C., attorneys for Export Development Canada,**

1633 Broadway, 47th Floor, New York, New York 10019

(Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.);

9. Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.);

10. The Office of the United States Trustee for the Southern District of New York,

33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq.);

11. The U.S. Attorney's Office, S.D.N.Y.,

86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.);

12. Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims,

375 Park Avenue, 35th Floor, New York, New York 10152-3500

(Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and

One Thomas Circle, N.W. Suite 1100, Washington, DC 20005

(Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.);

13. Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafellet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.);

14. FTI Consulting, as the GUC Trust Monitor and as the Avoidance Action Trust Monitor, 3 Times Square, 11th Floor New York, NY 10036 (Attn: Conor Tully);

15. Crowell & Moring LLP, attorneys for the Revitalizing Auto Communities Environmental Response Trust,

590 Madison Avenue, 19<sup>th</sup> Floor, New York, New York 10022-2524

(Attn: Michael V. Blumenthal, Esq.);

16. Kirk 09-50026-reg Doc 13045 Filed 01/14/15 Entered 01/14/15 16:26:57  
Main Document

P. Watson, Esq., as the Asbestos Trust Administrator,

2301 Woodlawn Boulevard, Austin, Texas 78703 and

**17. Jeffrey Rhodes Esq., Dickstein Shapiro, LLP, attorneys for the GUC Trust,**  
**1825 Eye Street, NW Washington, DC 20006**

**18. Bill de Blasio, Mayor of New York City**  
**253 Broadway, New York New York 10007**

**Exhibit - A**

Endorsed Order:

The Court received the attached objection to the Motion to Authorize filed by the GUC Trust (ECF No. 13045) after the deadline for filing objections and after entering an order granting the motion (ECF No. 13063). Nothing in the objection causes the Court to alter or retract its order. Deeming the objection to be a motion for reargument, pursuant to Local Rule 9023-1, reargument is denied.

Dated: New York, New York  
January 30, 2015

s/Robert E. Gerber  
United States Bankruptcy Judge

**Hearing Date and Time: February 04, 2015 at 9:45 a.m. (Eastern Time)**  
**Objection Deadline: January 28, 2015 at 4:00 p.m. (Eastern Time)**

Atul C. Shah, MD  
2884 Manorwood Drive  
Troy, Michigan 48085  
Telephone (248) 879-0795 Home  
Telephone (248) 835-5025 Cell Phone

Representing Himself (Atul C. Shah) for  
MLC GUC Claim No. 28820 filed by Atul Shah

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

		-x
	I	
	I	
<b>In re</b>	I	
	I	
<b>Motors Liquidation Company, et al.,</b>	I	<b>Chapter 11 Case No</b>
<b>f/k/a General Motors Corp., et al.</b>	I	<b>09-50026 (REG)</b>
	I	<b>(Jointly Administered)</b>
	I	
<b>Debtors.</b>	I	
	I	
	-x	

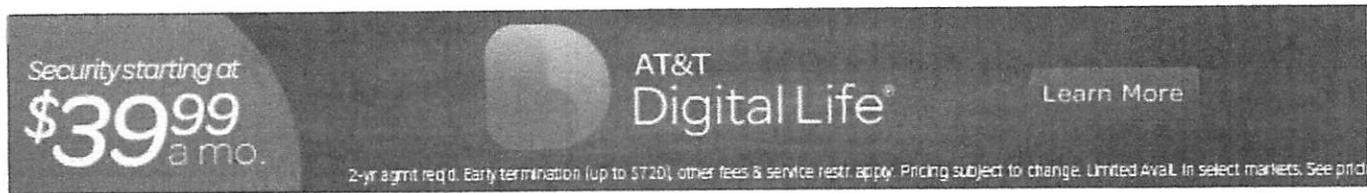
**RESPONSE WITH OBJECTION BY ATUL C. SHAH TO THE NOTICE  
OF HEARING ON MOTION OF WILMINGTON TRUST COMPANY, AS  
GUC TRUST ADMINISTRATOR, FOR AN ORDER**

**(A) GRANTING AUTHORITY TO LIQUIDATE NEW GM SECURITIES  
AND USE DIVIDEND CASH FOR THE PURPOSES OF FUNDING  
ADMINISTRATIVE AND REPORTING FEES, COSTS AND  
EXPENSES OF THE GUC TRUST AND**

**(B) EXTENDING THE DURATION OF THE GUC TRUST**

**(C) SHARING OF THE MONETARY WEALTH BETWEEN  
INTELLECTUAL, ADMINISTRATIVE, ENTREPRENEUR AND  
GENERAL LABOR CLASSES**

**Exhibit - B**



# 'Historic' storm set to slam Northeast; airlines cancel flights

By Michael Pearson and Catherine E. Shoichet, CNN

Updated 10:38 PM ET, Mon January 26, 2015



Exhibit - B

**Exhibit - C**



## Proof of Delivery

[Close Window](#)

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number: 1Z4500450744316309  
Service: UPS 2nd Day Air A.M.®  
Weight: .70 lb  
Shipped/Billed On: 01/26/2015  
Delivered On: 01/30/2015 10:13 A.M.  
Delivered To: NEW YORK, NY, US  
Signed By: FRANCOIS  
Left At: Mail Room

Thank you for giving us this opportunity to serve you.

Sincerely,

UPS

Tracking results provided by UPS: 02/04/2015 3:58 P.M. ET

[Print This Page](#)[Close Window](#)*Gibson Dunn & Crutcher*

**Gibson, Dunn & Crutcher LLP, attorneys  
Wilmington Trust Company as GUC Trust Administrator  
200 Park Avenue, 47th Floor,  
New York, New York 10166 (Attn: Keith Martorana, Esq.)**

Exhibit - C

Apps Google Carlson Craft® Uniflex/Quicker... Rundowns Havener Tech P...

Mail Room

Signed By:  
FRANCOIS

Print of Delivery

What time will your package  
be delivered to your home?

Get FREE approximate  
Delivery Windows on most

UPS packages.

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Last check: UPS My Choice® Member



Sign up for UPS My Choice®

b Right On Target... ADP ezlaborM... UPS 2nd Day Air

A.M.

USPS.com® - E...

Rubber Stamp -... Leadership/OW...

Shipment Progress			
Location	Date	Local Time	Activity
New York, NY United States	01/30/2015	10:13 A.M.	Delivered
Parsippany, NJ United States	01/20/2015	2:03 A.M.	Out For Delivery
Upton, MI United States	01/29/2015	9:58 A.M.	Arrival Scan
Upton, MI United States	01/29/2015	10:00 P.M.	Departure Scan
Madison Heights, MI United States	01/28/2015	11:44 P.M.	Departure Scan
United States	01/26/2015	12:12 P.M.	Order Processed, Ready for UPS

Additional Information

Shipped/Billed On: 01/26/2015  
Type: Package  
Weight: 0.70 lb

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View Examples

Contact UPS

Brows Online Support

Small Bus.

Support  
Get Started  
Register



Exhibit - C



## Proof of Delivery

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Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number: 1Z4500450745410213  
Service: UPS 2nd Day Air A.M.®  
Weight: .50 lb  
Shipped/Billed On: 01/26/2015  
Delivered On: 01/30/2015 10:18 A.M.  
Delivered To: NEW YORK, NY, US  
Signed By: DIXON  
Left At: Mail Room

Thank you for giving us this opportunity to serve you.

Sincerely,

UPS

Tracking results provided by UPS: 02/04/2015 4:45 P.M. ET

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Weil, Gotshal & Manges

Weil, Gotshal & Manges LLP, attorneys  
Motors Liquidation Company GUC Trust,  
767 Fifth Avenue,  
New York, New York 10153

Exhibit - C

... Apps Google Carlson Craft® Unitek® Quicken® Rundowns HavenTech® Right On Target... ADP elaborM... USPS.com® E... Rubber Stamp... Leadership/Ov

What time will your package be delivered to your home?  
Get FREE approximate delivery windows on most UPS packages

**Continue**

Delivery Windows on most UPS packages

I'm already a UPS My Choice® Member

Shipping Progress

Location	Date	Local Time	Activity
New York, NY United States	01/30/2015	10:18 A.M.	Delivered
Parlippay, NJ United States	01/30/2015	1:54 A.M.	Out For Delivery

01/29/2015 3:41 P.M. We've incorrectly sorted the package at our facility. This may cause at least one business day delay.

01/29/2015 9:56 A.M. Arrival Scan

01/26/2015 10:00 P.M. Recent weather has caused delivery delays. Recovery efforts are under way to deliver your package as soon as possible. We're working to deliver your package as soon as possible.

Livonia, MI United States 01/27/2015 4:35 A.M. Departure Scan

Livonia, MI United States 01/27/2015 12:21 A.M. Arrival Scan

Madison Heights, MI United States 01/26/2015 11:44 P.M. Capture Scan

United States 01/26/2015 9:00 P.M. Origin Scan

United States 01/26/2015 12:12 P.M. Order Processed Ready for UPS

Shipped/Arrived On: 01/26/2015  
Type: Package  
Weight: 0.50 lb

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Browse Online Support

Small UPS

Live Chat ▾

Call Customer Service

Solutions for

Healthcare

Small Business

High Tech

More...

Other UPS Sites:

Select a website ▾



Exhibit - C



## Proof of Delivery

[Close Window](#)

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number: 1Z4500450744034971  
Service: UPS 2nd Day Air A.M.®  
Weight: .60 lb  
Shipped/Billed On: 01/26/2015  
Delivered On: 01/27/2015 10:26 A.M.  
Delivered To: DETROIT, MI, US  
Signed By: WADE  
Left At: Inside Delivery

Thank you for giving us this opportunity to serve you.

Sincerely,

UPS

Tracking results provided by UPS: 02/04/2015 4:14 P.M. ET

[Print This Page](#)[Close Window](#)

General Motors LLC,  
400 Renaissance Center,  
Detroit, Michigan 48265  
(Attn: Lawrence S. Buonomo, Esq.)

Exhibit - C

**Exhibit - D**

TWEETS FOLLOWING FOLLOWERS  
169 6 398

 Follow

## USBC SDNY

@usbcnsdny

U.S. Bankruptcy Court, Southern District  
of New York

📍 New York, NY

🔗 nysb.uscourts.gov

Joined September 2009

### Tweets Tweets & replies

✉ USBC SDNY @usbcnsdny · Feb 6  
NYSB CM/ECF and PACER unavailable 5:30PM-11:30PM TODAY

4 17 1 3

✉ USBC SDNY @usbcnsdny · Feb 4

New opinions on website (NYSB) tinyurl.com/jwn9j6a

4 17 1 3

✉ USBC SDNY @usbcnsdny · Jan 30

New opinions on website (NYSB) tinyurl.com/m9mm2er

4 17 1 3

✉ USBC SDNY @usbcnsdny · Jan 26

Due to storm, NYSB court will be closed on  
Tues, Jan 27, 2015. Matters scheduled for  
Tues (Jan 27) AND Wed (Jan 28) have been  
adjourned.

4 17 3 1 3

Exhibit - D